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July 7, 1993

David J. DeLaHunt
Normin Broadcasting Co.
P.O. Box 49
Park Rapids, MN 56470

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
Room 222
1919 M Street N.W.
Washington, D.C. 20554

Dear Ms. Searcy:

Enclosed is the original signature copy and four additional copies of a proposed rulemaking. This rulemaking is for KSKK(FM), FCC File No. BPH-920611MI, Staples, Minnesota.

If any questions should arise concerning this matter please communicate with me at the above.

Sincerely,



David J. DeLaHunt
Normin Broadcasting Co.

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

Amendment of Section 73.202(b),)
Table of Allotments, FM Broadcast)
Station (Staples, Minnesota))
RM-

To: Chief, Allocations Branch
Policy and Rules Division

PETITION FOR RULEMAKING

I, David J. DeLaHunt, hereby submit a Petition For Rulemaking to amend Section 73.202(b) of the Commission's Rules. The proposed change in Section 73.202(b) is as follows:

	<u>PRESENT</u>	<u>PROPOSED</u>
Staples, Minnesota	Ch. 234A	Ch. 234C3

I currently hold a Construction Permit (File No. BPH-920611MI) to build a new FM station, KSKK(FM) on Channel 234A, Staples, Minnesota. The proposed change can be made by the Commission in full harmony with Section 73.207 of the Commission's Rules. The proposal will not conflict with any other existing broadcast station operations and requires no other change to the Table of Allotments. Please see the attached technical statement to support this claim.

Normin Broadcasting Co. advises the Commission that should it be determined that the public interest would be served by adopting the proposal in this petition, it will promptly

submit to the Commission and Application for Construction Permit for the proposed Channel 234C3 Staples, Minnesota, allocation.

Respectfully submitted,

Dated: July 7, 1993

A handwritten signature in black ink, appearing to read "David J. DeLaHunt", written over a horizontal line.

**David J. DeLaHunt
Normin Broadcasting Co.
P.O. Box 49
Park Rapids, MN 56470**

**TECHNICAL STATEMENT IN SUPPORT OF A PETITION FOR
RULEMAKING TO AMEND THE FM TABLE OF ALLOTMENTS
NORMIN BROADCASTING CO.
STAPLES, MINNESOTA**

**STATEMENT OF DAVID J. DELAHUNT
IN SUPPORT OF A
PETITION FOR RULEMAKING REQUESTING AMENDMENT
OF SECTION 73.202(b) OF THE
RULES AND REGULATIONS**

Proponent: NorMin Broadcasting Co.

I, David J. DeLaHunt, hereby submit this Petition for Rulemaking requesting amendment of Section 73.202(b) of the Rules and Regulations.

I, currently hold a Construction Permit (FCC File No. BPH-920611MI) to build a new FM station, KSKK on Channel 234A, Staples, Minnesota. With this filing of this statement and exhibits, I request the amendment of Section 73.202(b) of the Rules and Regulations (Table of FM Allotments) in the following manner:

	<u>Add</u>	<u>Delete</u>
Staples, Minnesota	234C3	234A

As detailed herein, this amendment of the Table of FM allotments will allow the upgrade of this allotment in order to provide expanded service to the public and a more efficient use of the broadcast spectrum.

Staples is a Class A allotment, authorized to operate on Channel 234A (94.7 MHz). It is proposed to upgrade its facilities to a Class C3 with a site change. On

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KSKK(FM) - STAPLES, MINNESOTA
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April 29, 1986, the Federal Communications Commission released the Report and Order in MM Docket No. 85-313 permitting an FM station to upgrade its facilities on adjacent or co-channel frequencies, even though a second channel of equivalent class cannot be assigned to that community.

A complete frequency allocation study was performed to ensure that a Channel 234C3 allotment at Staples, Minnesota, would meet all of the required minimum distance separations with respect to all existing and proposed facilities and assignments in the vicinity. The attached Table 1 details the results of this study and demonstrates that the proposed Channel 234C3 is in conformance with all required distance separations as set forth in the FCC Rules and Regulations. For the purposes of this rulemaking, the following reference coordinates were selected for the new site:

**N. L. 46° 23' 29"
W. L. 94° 57' 21"**

The reference coordinates are located approximately 12.0 kilometers northwest of the center of Staples, Minnesota, the principal community to be served. From the reference site the city boundary of Staples, Minnesota is fully encompassed by the proposed 3.16 mV/m (70 dBu) coverage contour. The proposed Class C3 facility was assumed to operate with the maximum allowable effective radiated power (ERP) and height above average terrain (HAAT) of 25 kW

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KSKK(FM) - STAPLES, MINNESOTA
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and 100 meters, respectively.

**The above statement and supporting exhibits were prepared by me or under
my direct supervision and are believed to be true and correct.**

DATED: July 7, 1993


David J. DeLaHunt

TABLE I
ALLOCATION STUDY

Study Name: KSKK(FM)
STAPLES, MN
Channel: 234C3
Latitude: 46 23 29
Longitude: 94 57 21

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
231A	KYRS	Atwater	MN 45 4 24	94 45 20	BLH-881208KC	LIC	3.000	100	173.9	147.32	42.0	105.32
231A	KFML	Little Falls	MN 46 0 16	94 19 42	BLH-881206KA	LIC	3.000	100	131.5	64.78	42.0	22.78
232C3		Aitkin	MN 46 36 15	93 39 55	-	VACANT	.000	0	76.1	101.86	43.0	58.86
			Effective 8-13-90-Rsvd for KEZZ, per D89-376									
232A	KEZZ	Aitkin	MN 46 32 7	93 50 26	BLH-850312LV	LIC	3.000	100	79.0	87.15	42.0	45.15
			*To channel 232C3 per D89-376									
232A	KMSR	Sauk Centre	MN 45 42 30	95 6 18	BLH-7025	LIC	3.000	91	188.7	76.80	42.0	34.80
233C	KSTPFM	St. Paul	MN 45 3 45	93 8 22	BMLH-910923KF	LIC	100.000	372	135.7	204.47	176.0	28.47
234A	KSKK	Staples	MN 46 21 34	94 46 55	BPH-920611MI	CP	6.000	38	104.8	13.84	142.0	-128.16
234A		Staples	MN 46 21 18	94 47 42	-	VACANT	.000	0	108.1	13.02	142.0	-128.98
			Class B1 with respect to Canada									
234C2		Springfield	MN 44 22 45	95 19 0	-	VACANT	.000	0	187.3	225.41	177.0	48.41
			Effective 9-8-92-Reserved for KLPR per D92-94									
234C1	KNOXFM	Grand Forks	ND 48 0 20	97 4 18	BLH-791114AK	LIC	100.000	76	319.1	240.64	211.0	29.64
234C2	KLPR	Springfield	MN 44 22 18	95 19 41	BMPH-921211IE	APP	50.000	150	187.5	226.35	177.0	49.35
			From Channel 289A per D92-94									
235C1	KQDSFM	Duluth	MN 46 47 41	92 7 5	BLH-811022AP	LIC	100.000	213	77.3	222.04	144.0	78.04
235C	KQAA	Aberdeen	SD 45 6 32	97 53 30	BLH-790914AF	LIC	100.000	390	239.0	269.27	176.0	93.27
235C2	KMXK	Cold Spring	MN 45 23 53	94 25 15	BMPH-881205IB	CP MOD	50.000	150	159.3	117.96	117.0	.96
			From 237A per D87-412-To amend to Cold Spring, MN D90-616; amended to									
236C1	KKDL	Detroit Lakes	MN 46 40 27	96 13 39	BLH-881003KC	LIC	100.000	296	288.4	102.50	76.0	26.50
			FROM CHANNEL 237 PER D84-719									
237A	KMXK	Litchfield	MN 45 7 2	94 33 13	BLH-7137	LIC	3.000	91	167.4	145.04	42.0	103.04
			*TO CHANNEL 235C2 PER D87-412-To amend to Cold Spring, MN per D90-616									
237C2	KDJSFM	Willmar	MN 45 1 23	95 15 57	BPH-910821MD	CP	50.000	133	189.1	153.99	56.0	97.99
288A	KASFM	Albany	MN 45 37 53	94 36 0	BPH-880914MO	CP	3.000	100	161.9	88.86	12.0	76.86

END OF STUDY